

**EXHIBIT 15**

Naveen Jain

In re matter of Intelius, Inc.

June 18, 2009



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In re matter of Intelius, Inc.

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<p>1 A. I think that most people would -- you know, 2 would look at this stuff and say, You know what? By 3 clicking "Yes" here are the offer details, I look at the 4 stuff, Oh, I'll have to pay, I don't want to pay, and 5 they will click on "No" and move on. 6 And the fact is a vast majority of people did 7 that. So a vast majority of the people obviously click 8 on "No." So that means they obviously very quickly come 9 to the conclusion that's not something they want. 10 <b>Q. But how long do you think it takes the average</b> 11 <b>person to read all the text on this page?</b> 12 A. I believe we do have the times that a person 13 spends on the page, and I believe that is something we 14 keep track of, at least. We have that information. I 15 don't have it handy, but we do have that information 16 available. 17 <b>Q. But in general, how long do you think it takes</b> 18 <b>to read this entire page?</b> 19 A. You mean if somebody start from the top to the 20 bottom? If somebody were to read every single word, how 21 long would it take to read it? 22 <b>Q. Yes.</b> 23 A. I don't know. It really depends on the person. 24 <b>Q. I'd like to have you read it and time it and</b> 25 <b>see how long that -- how long that takes you.</b></p>	<p>1 objection on the record, which is to the form of the 2 question, and obviously the average reader on the 3 Internet does not read out loud. 4 MS. TASSI: Are you ready, Eric? 5 MR. Setala: Yes. 6 <b>Q. All right, go.</b> 7 A. Thank you. Your order has been successfully 8 completed. Get \$10.00 off as a member of 9 Identity Protect. Register below to claim \$10 10 off your third month fee as a member of 11 Identity Protect. Try it free for 7 days. 12 Click here for details. 13 Identity Protect Includes: Detailed Personal 14 Identity profile - Find out if you're at risk 15 for identity theft with a complete report of 16 your identity information, including a current 17 credit card, address history, aliases, 18 background, and more. 19 24/7 Identity Monitoring and Alerts - Prevent 20 identity theft before it happens with automatic 21 monitoring that scans billions of public 22 records daily and alerts you in advance about 23 suspicious activity. 24 Identity Recovery Assistance - Let 25 Professionals help you recover your identity,</p>
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<p>1 A. I'm the slowest reader and I'm a foreigner. So 2 those two things are against me. 3 <b>Q. We will take a minute off however long it takes</b> 4 <b>you to read it.</b> 5 MS. TASSI: Why don't you show the stopwatch at 6 zero to opposing counsel. Let the record reflect that 7 Eric Setala is showing the starting point of his 8 stopwatch. 9 <b>Q. When I say "Go," Mr. Jain -- I'm glad you have</b> 10 <b>some water on hand. When I say "Go," just start from the</b> 11 <b>top and --</b> 12 A. Before you do that, if I read, will you be able 13 to type it, or do I just need -- 14 MR. HARRIGAN: He's not supposed to read it out 15 loud, right? 16 MS. TASSI: No, no. Read it out loud. 17 MR. HARRIGAN: Out loud? 18 MS. TASSI: Yes. 19 THE WITNESS: Will she be able to keep up with 20 me? I want to make sure you don't say, "Stop, stop, 21 stop." 22 MS. TASSI: No, I think if you read it at an 23 average pace. Just start at the beginning. You might 24 need to go between G and H. 25 MR. HARRIGAN: Before we start, I will get my</p>	<p>1 clear your name and restore your credit to 2 pre-theft status if you were to become a victim 3 of identity fraud. 4 Additional Benefit Details: Free Credit 5 Report. 10% discount on future Intelius 6 purchases. Credit, financial, public records 7 monitoring, instant email alerts of suspicious 8 activity. \$25,000 identity Theft insurance. 9 Offer Details: Simply click "YES" to activate 10 your trial membership and take advantage of the 11 great benefit that Identity Protect has to 12 offer plus claim your \$10.00 off with your 13 third month's Identity Protect service. The 14 membership fee of 19.95 per month will be 15 charged/debited by Intelius to the 16 credit/debit card you used today with 17 Intelius.com after 7-day free trial and then 18 automatically charged/debited each month at the 19 then-current monthly membership fee so long as 20 you remain a member. Of course you can call us 21 at (877)974-1563 within the first 7 days to 22 cancel and you will have paid nothing and owe 23 nothing. You may also cancel or place your 24 service on hold within the My Intelius.com 25 section of the Intelius.com website at any</p>

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<p>1 time. Remember, Identity Protect comes with 2 our guarantee - you can call to cancel any time 3 and you will no longer be charged/debited. If 4 you used a debit card today, then beginning on 5 or after 7 days from now, your monthly 6 membership for Identity Protect will be 7 automatically debited each month on or about 8 the same date from the checking account 9 associated. 10 Disclaimers: Identity Protect and its benefit 11 providers are not credit repair service 12 providers, do not receive such fees for such 13 services, nor are they credit clinics, credit 14 repair or credit services organizations or 15 businesses, as defined by federal and state 16 law. 17 <b>Q. Thank you. The stopwatch reads two minutes 18 seventeen seconds.</b> 19 A. Are you going to take a minute off now? 20 <b>Q. You read nicely and quickly.</b> 21 A. That was the deal, you take one minute off. 22 MS. TASSI: Did you show your watch to opposing 23 counsel? 24 MR. HARRIGAN: That's all right. 25 <b>Q. Thank you for going through that. It helps</b></p>	<p>1 <b>through the interstitial offers, the post-transaction 2 offers, for a couple of months.</b> 3 <b>What months were those?</b> 4 A. Again, I don't remember exactly, but it would 5 be sometime, I want to say, July, July, August. Sometime 6 along those lines. 7 <b>Q. Do you know when you stopped using the 8 post-transaction offers?</b> 9 A. For Identity Protect? 10 <b>Q. Yes.</b> 11 A. Sometime in that time frame. 12 <b>Q. And while you were using Identity Protect 13 post-transaction offers, was it a successful form of 14 marketing for that product?</b> 15 A. In what sense? 16 <b>Q. Were you making a lot of money from it? Were 17 you enrolling a lot of customers?</b> 18 A. Identity Protect is actually a very good 19 product, and I believe the feedback, at least from what I 20 understand, is that the customers like the product. 21 <b>Q. Right, but were you enrolling a lot of 22 customers?</b> 23 A. "Lot" is a relative term, but I believe it was 24 successful, yes. 25 <b>Q. What is your understanding of what a conversion</b></p>
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<p>1 <b>give an idea of how long it takes a consumer to read it, 2 even though you read more slowly aloud.</b> 3 <b>And you mentioned that you kept track of the 4 amount of time that a consumer was on this page.</b> 5 <b>Is that between their Intelius transaction and 6 clicking on "Yes"?</b> 7 A. I believe so. 8 <b>Q. And is there any particular reason why you keep 9 that information?</b> 10 A. I don't know. I think that was one of the 11 brilliant ideas that came from engineering. They just 12 wanted to see how long a person stares at this page, and 13 that is something they thought they might find meaningful 14 some day. 15 <b>Q. Has anything been made of that? Have you ever 16 used that information for any purpose?</b> 17 A. I don't know. I don't know. 18 <b>Q. Have you ever used it to try to confirm that 19 somebody actually read the page?</b> 20 A. I believe that was the information that we made 21 it available to customer service, I believe, so that if a 22 customer -- so they can tell the customer how much they 23 spent time on the page or not. I'm not sure how it was 24 used, but I believe it was available to them. 25 <b>Q. You mentioned marketing Identity Protect</b></p>	<p>1 <b>is in marketing?</b> 2 A. Well, different -- there are different 3 conversions. 4 So, for example, we look at -- one of the ratio 5 we look at is the number of people who come to our 6 website and they purchase. On travel website, they call 7 look-to-book ration. That means how many people come to 8 look and how many people actually book the reservation. 9 So that is one form of conversion. 10 <b>Q. And do you keep conversion rate records of your 11 different offers for Identity Protect?</b> 12 A. I don't know. 13 <b>Q. How well they went, how many consumers saw the 14 ad and actually enrolled?</b> 15 A. I don't know, to be honest with you. 16 <b>Q. You don't --</b> 17 A. I don't know what records are kept or not. 18 <b>Q. But do you know --</b> 19 MR. HARRIGAN: Could you just clarify whether 20 you are asking whether they keep track of it on a current 21 basis or whether they have an archive? 22 <b>Q. Well, are you aware of whether you keep track 23 of that on a regular basis?</b> 24 A. Current basis, I believe so, but I'm not sure 25 if they are recorded and kept historical or not.</p>

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